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Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC

**IN THE UNITED STATES DISTRICT COURT
THE DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT
Box”), a Wyoming corporation;
JASON R. ANDERSON, an individual;
JACOB S. ANDERSON, an individual;
SCHAD E. BRANNON, an individual;
ROYDON B. NELSON, an individual;

**MOTION FOR *PRO HAC VICE*
ADMISSION OF
JEFFREY D. BROOKS**

Case No. 2:23-cv-00482-RJS

Judge Robert J. Shelby

JAMES E. FRANKLIN, an individual;
WESTERN OIL EXPLORATION
COMPANY, INC., a Nevada corporation;
RYAN BOWEN, an individual;
IX GLOBAL, LLC, a Utah limited liability
company;
JOSEPH A. MARTINEZ, an individual;
BENJAMIN F. DANIELS, an individual;
MARK W. SCHULER, an individual;
B & B INVESTMENT GROUP, LLC (d/b/a
“CORE 1 CRYPTO”), a Utah limited
liability company;
TRAVIS A. FLAHERTY, an individual;
ALTON O. PARKER, an individual;
BW HOLDINGS, LLC (d/b/a the “FAIR
PROJECT”), a Utah limited liability
company;
BRENDAN J. STANGIS, an individual; and
MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming
limited liability company;
BUSINESS FUNDING SOLUTIONS, LLC,
a Utah limited liability company;
BLOX LENDING, LLC, a Utah limited
liability company;
CALMFRITZ HOLDINGS, LLC, a Utah
limited liability company;
CALMES & CO, INC., a Utah corporation;
FLAHERTY ENTERPRISES, LLC, an
Arizona limited liability company;
IX VENTURES FZCO, a United Arab
Emirates company;
PURDY OIL, LLC, a Nebraska limited
liability company;
THE GOLD COLLECTIVE LLC, a Utah
limited liability company; and
UIU HOLDINGS, LLC, a Delaware limited
liability company,

Relief Defendants.

I, Matthew R. Lewis, of the law firm Kunzler Bean & Adamson, PC, hereby move for the *pro hac vice* admission of Jeffrey D. Brooks (“Applicant”) as counsel for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson (collectively, the “Defendants”), as well as Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC (collectively, the “Relief Defendants”) in the above-referenced matter, and I consent to serve as local counsel. The Application is attached hereto as Exhibit A; the proposed Order has been submitted herewith; and the admission fee will be paid to the Court at the time of filing. I certify that the Applicant is not a member of the Utah State Bar, does not maintain a law office in Utah, and has not been admitted to *pro hac vice* in any case in this district in the previous 5 years.

DATED this 18th day of September, 2023.

KUNZLER BEAN & ADAMSON, PC

/s/ Matthew R. Lewis

Matthew R. Lewis

Taylor J. Smith

Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 18th day of September, 2023, I caused a true and correct copy of the foregoing **MOTION FOR *PRO HAC VICE* ADMISSION OF JEFFREY D. BROOKS** to be submitted for electronic filing through the Court's CM/ECF system.

/s/ Michelle Hansen
Michelle Hansen

EXHIBIT A

**to Motion for *Pro Hac Vice*
Admission of Jeffrey D. Brooks**



**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
APPLICATION FOR PRO HAC VICE ADMISSION**

CONTACT INFORMATION

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Pro Hac Vice Applicant:	Jeffrey D. Brooks
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An applicant who intend to become a member of the Utah State Bar, please identify the type of admission you seek:

- ☐ Admission by Bar Examination
☐ Admission by UBE Transfer
☐ Motion/Reciprocal

STATE AND FEDERAL BAR MEMBERSHIPS

Jurisdiction	Bar Number	Date of Admission
New York	2894301	1998
US District Court – Southern District of New York	JB3109	2002
US District Court – Eastern District of New York	JB3109	2002
Second Circuit Court of Appeals	NA	2019

Have you ever been the subject of disciplinary action by any bar or court to which you have been admitted?

☐ Yes

☒ No

If yes, please explain:

**LIST PRO HAC VICE ADMISSIONS TO THE DISTRICT OF UTAH
IN THE PREVIOUS 5 YEARS**

Case Name	Case Number	Date of Admission

If you have been admitted pro hac vice in 3 unrelated cases in this district in the previous 5 years, please explain your reason(s) for not seeking admission to the Utah State Bar:

I certify that I am a member in good standing of all bars and courts to which I have been admitted.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
I certify that I have read and will comply with the Utah Rules of Professional Conduct and the Utah Standards of Professionalism and Civility.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
I certify that I am not a member of the Utah State Bar.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
I certify that I have listed all cases in which I have been admitted pro hac vice this district in the previous 5 years.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
I certify that I do not maintain a law office in Utah.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
I certify that the foregoing is true and correct and is subject to the penalty of perjury.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Under DUCivR 83-1.1(d)(2) you must register to efile to receive electronic notification of case activity. Please visit the court's Attorney Admissions webpage for instructions.


Signature

9-18-2023
Date